

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, ET AL.,

Defendants.

Case No. 1:25-cv-10685 (WGY)

PLAINTIFFS' MOTION TO SEAL

Pursuant to Local Rule 7.2, Plaintiffs respectfully move the Court for leave to file under seal portions of their Pretrial Brief. The Pretrial Brief and accompanying exhibits contain excerpts from the provisionally-sealed administrative record, Dkt. 106, and from non-public materials provided in discovery.

Plaintiffs will publicly file the non-confidential portions of the Pretrial Brief by 6:00 p.m. EST on Tuesday, July 1, 2025. To the extent that portions of the administrative record are later unsealed or designated non-confidential, Plaintiffs will unseal the relevant portions of the Pretrial Brief by 6:00 p.m. EST on the next business day. The sealed portions of the Pretrial Brief will not be used or disseminated outside of this litigation, nor outside of their intended purpose.

June 27, 2025

Respectfully submitted,

Edwina Clarke (BBO 699702)
David Zimmer (BBO 692715)
Zimmer, Citron & Clarke, LLP
130 Bishop Allen Drive
Cambridge, MA 02139

/s/ Ramya Krishnan

Ramya Krishnan
Scott Wilkens
Talya Nevins
Carrie DeCell
Xiangnong Wang

(617) 676-9423
edwina@zimmercitronclarke.com

Noam Biale
Michael Tremonte
Alexandra Conlon
Courtney Gans
Sher Tremonte LLP
90 Broad Street, 23rd Floor
New York, New York 10004
(212) 202-2603
mtremonte@shertremonte.com
nbiale@shertremonte.com

Jackson Busch
Alex Abdo
Jameel Jaffer
Knight First Amendment Institute
at Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646) 745-8500
Ramya.Krishnan@knightcolumbia.org

Ahilan T. Arulanantham (SBN 237841)
Professor from Practice
UCLA School of Law
385 Charles E. Young Dr. East
Los Angeles, CA 90095
(310) 825-1029
arulanantham@law.ucla.edu

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, the undersigned counsel, certify that on June 27, 2025, I electronically filed the foregoing motion in the United States District Court for the District of Massachusetts using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: June 27, 2025

/s/ Ramya Krishnan

Ramya Krishnan